

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

<b>INTERNATIONAL PAPER COMPANY,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 2:22-cv-2789-MSN-CGC</b>
	)	
<b>BEAZLEY INSURANCE COMPANY, INC. and ZURICH AMERICAN INSURANCE COMPANY,</b>	)	<b>JURY TRIAL DEMANDED</b>
	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF INTERNATIONAL PAPER COMPANY’S MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff International Paper Company (“IP”) moves this Court for an order granting summary judgment in its favor and against Defendant, Beazley Insurance Company Inc. (“Beazley”), with respect to Defendant Beazley Insurance Company’s first, fourth, sixth, seventh, eighth, ninth, tenth, eleventh, twelfth, thirteenth, fourteenth and fifteenth affirmative defenses (as stated in Beazley’s Answer to IP’s Complaint) because there is no genuine issue of material fact that these defenses are not applicable to IP’s insurance coverage claim for Employee Theft under the Beazley insurance policy. IP details the facts and supporting authority for this motion in IP’s brief filed concurrently with this motion.

Accordingly IP respectfully requests that the Court grant this motion and enter an order, in the form accompanying this motion, striking and dismissing with prejudice Beazley’s first, fourth, sixth, seventh, eighth, ninth, tenth, eleventh, twelfth, thirteenth, fourteenth and fifteenth affirmative defenses.

Dated: January 30, 2024

s/John Sylvester

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